

COPY SENT TO: WILLIAM SAWYER
Central Steel Drum Co.
704 Doremus Avenue
Newark, N.J. 07105
EPA I.D. # NJD011482577

JAN 1 1982
ENFORCEMENT SECTION
NEW YORK, N.Y. 10007

December 7, 1981

Objective:

On December 7, 1981 Angela Morales (Source Monitoring Section), John Witkowski (Emergency Response Section), Hank Wheat and Mike Skirka (Technical Assistance Team) were asked to perform a joint inspection at Central Steel Drum located at 704 Doremus Avenue, Newark, N.J. 07105. This site was referred to us by enforcement to determine possible RCRA, CERCLA, NPDES and FWPCA violations.

History of site

Central Steel Drum (CSD) is a steel drum reconditioning company which accepts "empty drums" for processing. Prior to the inception of this company, the facility was used by an ink pigment manufacturer.

C.S.D. Company processes approximately 3,000 thirty and fifty-five gallon "empty drums" per day, but receives daily shipments of varying quantities of these drums. Not all shipments are processed the same day since certain grades of drums are in higher demand than others. Approximately 30% of incoming drums formerly contained material from the paint industry, 30-40% contained materials from the food industry and the remaining 30-40% contain varying miscellaneous residues such as adhesives, inks and sandy material.

Operating Process at Facility

C.S.D. Co. refinishes "empty drums" by putting them through a process line, part of which involves incineration, cleaning and painting.

C.S.D. Co. claims to operate a "dry process", where water is not a waste product but is recycled. The water in this operation is used for cooling purposes associated with the incinerator.

At the beginning of the refinishing process, drums are turned upside down on a conveyor line and moved through the drum incinerator where the residue inside the drum is burned at 2,000° F. During the process, a sludge is generated and accumulated by a scraper belt into an open bin. Any sludge not removed by the scrapers is removed by hand and stored in open drums. The bin and any drums containing this sludge is then taken to the sludge incinerator that exposes the sludge to a temperature range of 2,000°-2,600° F for 8 hours (Official stated C.S.D. Co. was having problems with the incinerator). The resultant ash is then scraped out by hand from the incinerator and accumulated in a pile 10-15 feet away. This pile is reportedly placed on a concrete slab with no containment or protection from wind or rain erosion. The pile is approximately 4-5 feet high and 15 feet in diameter.

C.S.D. Co. has their waste ash transported by Jonas Waste Removal located at Barkridge Road, Sewell, N.J. 08080 and it is disposed of at Geological Reclamation Operations and Waste Systems, Inc. (GROWS Inc.) located at Bordentown NewFord Mill Road in Morrisville, PA. 19067.

FINDINGS: Based upon information provided by company officials and a review of existing records.

Manifest System:

C.S.D. Co had an insufficient manifest system. The TSD facility certification form was not found along with the generator form. Parts of the manifest were not completely filled out (ie. DOT waste description was missing). In addition, manifests for shipments prior to January 1981 were not available on request. There were a total of 11 manifest out of a possible 17 shipments.

Inspection Schedule:

No written inspection plan was available upon request. No one is assigned the responsibility of checking the waste for signs of disturbance.

Personnel Training:

No documents indicating job descriptions, actual training or future training to be given to personnel were available upon request.

Contingency Plan:

No contingency plan was available. The emergency coordinator is the supervisor in the vicinity of the emergency.

Operating Record:

No operating records were available upon request. Information on the location waste analysis, and operating summary reports of the waste ash were not available.

Closure and Post-Closure Plan:

No plans were available on request.

Waste Analysis Plan:

CSD did not have their own waste analysis plan but, Mr. Adamson, the plant manager, showed us two waste analysis performed by GROWS Inc. on the ash pile CSD manifests as non-hazardous. (See Appendix C for a recent EP Toxicity waste analysis performed on the waste ash.)

Visual Inspection of Facility

Mr. Adamson conducted a tour of the facility operations. All members of the inspection team were present with the exception of Mike Skirka who stayed behind with the equipment that was brought to the facility.

En route to the incinerating portion of the facility we were conducted past machinery that was throwing particules into the air and obstructing our vision. In addition, "empty drums" were blocking the way and were immediately removed by Mr. Adamson. Also, the corridors were filled with sludge and particulate matter. Upon arriving at the incinerator, we found approximately three men, without respiratory protection, loading drums with Sherwin-Williams labels onto a conveyor belt leading into the incinerator. At this point fumes were coming from the incinerator and Ms. Morales informed Mr. Adamson that she could not stay at this point of the process for too long a period of time. As the drums with Sherwin-Williams labels entered the incinerator, a plume of grey smoke and combustion by-product was emitted from the incinerator. At this point Hank Wheat, who was operating an HNU photoionization analyzer (organic vapor detector) indicated to us that the meter had been fluctuating and was now reading off scale (over 2,000 ppm). Standard operating procedure required that we wear Self-Contained Breathing Apparatus (SCBA) protection so we immediately left the incineration area. While leaving the area, another darker plume and an acidic mist surrounded us. The incinerator operation came to a halt for lunch break and the plume and mists dispersed.

Mr. Adamson then took us to the sludge burning incinerator and showed us how the scraper system worked. He stated that the company was having problems with the sludge incinerator and that it was presently burning sludge at a temperature range of 2,000-2,600°F for 8 hours. The resultant ash is scraped out of the incinerator by hand and is accumulated on what appeared to be bare ground 15 feet away. The pile is offered no protection from the elements. The pile is reportedly transported from the facility every ten days in a 20 cubic yard container.

At this point it was noted by Ms. Morales and Mr. Wheat, that there were random open drums filled with sludge matter and also drums with more than an inch of an adhesive or resin material inside. Some drums were found laying on the ground in disarray with resinous material spilling from it.

The inspection team then started back to the office and, en route, noted what appeared to be a ditch on the southeastern part of the facility. When asked what it was, Mr. Adamson stated that it was a small creek and that he would provide us with the name when we returned to the office. The area around the ditch appeared to be disturbed and the ditch had a green color with an oily sheen to it. Upon arriving at the office, Mr. Adamson asked Mr. Fischer (the company Secretary who signed the notification form) the name of the creek and no one seemed to know.

This concluded the inspection.

DISCUSSION

CSD recycles "empty drums" and in the process a sludge is generated. This sludge is then burned in a sludge burning incinerator which turns the sludge into an ash. CSD does not perform waste analysis on their waste since they believe it to be non-hazardous after it is burned. A waste analysis was performed by GROWS Inc.'s outside independent laboratory, Ages Laboratory located in Potstown, PA. GROWS Inc. has a Retesting Policy that requires that a sample of waste be tested every year to insure that the waste they receive is the same as the initial shipment. The initial sample in this case was tested on July 8, 1980 and the retested sample was tested on July 16, 1981 (Please note the date of letter in Appendix C.) The analysis performed on the waste ash sample include a test for EP Toxicity which showed the sample to be EP Toxic for lead. CSD is in violation for not manifesting their waste as hazardous and for not providing their own Waste Analysis Plan.

In a letter to Julio Morales-Sanchez, Director of Enforcement, (See Appendix A) CSD stated it did not file for a Part A permit since they do not take in materials for treatment nor do they store for more than 90 days. There seems to be confusion on their part since these elements are not the only criteria for falling within the jurisdiction of a TSD facility. This puts them in violation for treating hazardous waste without a TSD permit. It appears from the letter that CSD may have been in the computer system as having submitted a Part A application but, then deleted as a result of their letter to EPA.

There have been additional violation such as lack of Records Inspection, Facility Inspection and Contingency Plan. Also their waste pile and incinerator do not meet RCRA specifications.

RECOMMENDATIONS:

Enforcement action be taken.

- ✓ Suggest that a sampling inspection be performed at the facility by both the Air and Water Sections of EPA for possible contamination of air, soil, groundwater and nearby creek.
- ✓ Suggest that the Local Health Department be notified concerning health violations. OSHA was called and arrived at the facility on December 8th, 1981. They cited CSD for not having an adequate cover on one of their pulleys.
- ✓ CSD has called in Environmental Consulting Testing located in Cherry Hill, N.J. to perform an environmental audit on the facility. It is recommended that EPA obtain their report on the site which should be ready in approximately two weeks.
- ✓ Notify DEP of CSD's operations and possible violations.

DIRECTORY TO APPENDIX

APPENDIX A: INITIAL SITE INFORMATION

APPENDIX B: SITE LOCATION AND DESCRIPTION

APPENDIX C: WASTE ANALYSIS REPORT

APPENDIX D: LIST OF COMPANIES AND CONTACTS

APPENDIX A: INITIAL SITE INFORMATION

November 9, 1981

Central Steel Drum Recyclers
Dorcas Avenue, Newark, New Jersey

Fred N. Rubel, Chief
Emergency Response & Hazardous Materials Inspection Branch

Julio Morales-Sanchez Director
Enforcement Division

THRU: Barbara Metzger, Director
Environmental Services Division

Attached is a report concerning a facility which may have serious violations of EPA regulations. I intend to follow up in order to document actual violations. If you wish to assign an attorney to coordinate the effort, I will work through any designee. It would be appreciated if John Witkowski were contacted in this regard (FIS 349-6657). We otherwise will pursue the matter with individual program elements.

In any event, please advise us as to any previous enforcement activities at this site.

Attachment

cc: Ken Stoller
bcc: ✓ John Witkowski

2-ES-ERHIB:FRubel:sm:Bldg.209:6657

ES-ERHIB

Rubel Metzger

LAWRENCE W. BIERLEIN, P.C.

LAW OFFICES

910 SEVENTEENTH STREET, N. W.
WASHINGTON, D.C. 20006

(202) 659-9475

August 4, 1980

To: Members, National Barrel & Drum Association

Re: Notification to EPA of Hazardous Waste Activity

Every member of the drum reconditioning industry should attach this memo to their notification to EPA of involvement in hazardous waste activity.

EPA unofficially has advised this industry that an "empty" container, that formerly contained a material that would fall within the classification of hazardous waste, is not itself a hazardous waste unless the material is one of those listed in new Section 261.33(e).

EPA has refused to publish a formal acknowledgement of this position in the Federal Register, with any explanation of the term "empty," before the mandatory notification date of August 18.

Prudent business practice, therefore, compels every handler of "empty" packaging to give notice by August 18, 1980, of direct involvement in the generation, transportation, storage, treatment and disposal of every conceivable material that might be handled. EPA's failure to provide essential clarification in a timely manner forces this approach, even though many who give notice may not in fact be so engaged in waste handling. Where the regulations and the agency leave only doubt, commercial survival demands notification.

Sincerely,



Lawrence W. Bierlein
General Counsel

MSDO11482577

CENTRAL STEEL DRUM COMPANY

"Reconditioned and Relined Drums"

OK

March 12, 1981

del
LST

Mr. Julio Morales-Sanchez, Director
Enforcement Division
U.S. Environmental Protection Agency
Region 11
26 Federal Plaza
New York, New York 10278

done
3/18
af

FILED
MAR 17 1981
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

Dear Mr. Morales-Sanchez:

We are generators of over 1000 kilos of waste per month which we hold for less than (90) days. We dispose of this waste through the manifest system at an approved site in the State of Penna.

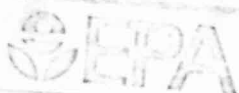
We do not take in waste for treatment, nor do we storage waste for more than (90) days this is the reason we did not file for a Part A Permit.

Very truly yours,

CENTRAL STEEL DRUM

Alan I. Fischer
Alan I. Fischer,
Secretary

AIF:pg



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

*NJ0011482577

INSTALLATION ADDRESS

CENTRAL STEEL DRUM COMPANY
704 DOREMUS AVE
NEWARK

NJ 07105

704 DOREMUS
NEWARK

NJ 07105



ecology and environment, inc.

300 McGAW DRIVE, RARITAN CENTER, 2ND FLOOR, EDISON, NEW JERSEY 08837, TEL. 201-225-9659

International Specialists in the Environmental Sciences

MEMORANDUM

TO: Fred N. Rubel, Chief - Hazard Response Branch, U.S. EPA

FROM: Danny L. Barney, TATL II

SUBJECT: Central Steel Drum Recyclers, Doremus Avenue, Newark, New Jersey

DATE: 18 September 1981

During the EPA/TAT response to a burning rail tank car of ethylene oxide in Newark, New Jersey on 28 July 1981, TAT member Dave Marlowe and I were asked by the Newark Fire Department (NFD) to conduct air monitoring at the nearby Circle Air Freight facility. Although the freight facility was upwind of the burning car, we conducted the test and did note above background readings with the HNU. We were then escorted by NFD 2nd Battalion Chief Nolan to the nearby Central Steel Drum Recyclers on Doremus Avenue.

The recycling facility was closed for the night, with (reportedly) only a night watchman present. The night watchman gave verbal permission for Marlowe and I to survey the facility, which consists of an incinerator, drum painting buildings, and open drum storage. The facility was extremely disreputable and housekeeping nonexistent. HNU readings were 20 to 30 ppm in open areas and 50 to 100 at the entrance of the drum painting area. The site, which covers 5 to 10 acres is virtually covered with pools of oil and various chemicals. The area is all filled marsh and is not covered by concrete or asphalt. Along the back of the site, oil and chemicals were observed flowing into adjacent ditches and wetlands. The number of drums on the site is unknown, however, I would estimate the number to be in the tens of thousands, many of which are leaking.

The incinerator was decrepit and had no scrubber system. Material cleaned from the drums was being burned inside the incinerator.

Partially through the inspection, the night watchman paged Marlowe and I on a P.A. system, and asked us to report to the office. We were then told we had to leave immediately. The watchman at this point was very upset and gave every indication of being extremely frightened. At that time we departed the site.

There is very strong visual evidence to suggest flagrant violations of NPDES, RCRA, FWPCA, and CERCLA. Due to the nature of the site and the magnitude of the problem, I recommend that a joint inspection be made by EPA, NJDEP, and local and State health officials. I also strongly recommend that EPA attorneys become involved in the case prior to any inspection, and that they provide the inspectors with any available information concerning ownership of the site, previous violation history, and current site status.

SENT TO: WILLIAM SAWYER
ENFORCEMENT DIV

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: Central Steel Drum Co.

EPA I.D. NUMBER:

WJDO11482577

COMPANY ADDRESS: 704 Doremus Ave.
Newark, N.J. 07105

COMPANY CONTACT OR OFFICIAL: Paul Adamson

INSPECTOR'S NAME:

Angela Morales

TITLE: Plant Manager.
(201) 244-8500

BRANCH/ORGANIZATION:

Environment Services Division

CHECK IF FACILITY IS ALSO A TSD

FACILITY

☒

DATE OF INSPECTION:

12/7/81

YES

NO

DO

REX

(1) Is there reason to believe that the facility has hazardous waste on site? yes,

a. If yes, what leads you to believe it is hazardous waste?
Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☒ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report) Appendix C in Report.

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

YES NO DON'T KNOW

- b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

~~Please explain:~~

- c. ~~Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.~~

Waste Ash pile 4-5 feet high and 15 feet in diameter.

- d. Describe the activities that result in the generation of hazardous waste.

Residue clinging to the inside of drums is burnt and reburned until an ash is produced.

- (2) Is hazardous waste stored on site?

- a. What is the longest period that it has been accumulated?

Monthly

- b. Is the date when drums were placed in storage marked on each drum? Waste is not stored in drums

but in a pile.

- (3) Has hazardous waste been shipped from this facility since November 19, 1980?

- a. If "yes," approximately how many shipments were made?

- (4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980? Apprx. 17 Shipments -

- Transported in a 20 cubic yard container.
- a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?

- b. If "no" or "don't know," please elaborate.

YESNODON'T
KNOW

* c. Does each manifest (or a representative sample) have the following information?

- a manifest document number ✓
- the generator's name, mailing address, telephone number, and EPA identification number ✓
- the name, and EPA identification number of each transporter ✓
- the name, address and EPA identification number of the designated facility and an alternate facility, if any: ✓
- a description of the wastes (DOT) ✓
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle ✓
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA ✓

* Note: WASTE IS MANIFESTED AS NON-HAZARDOUS ALTHOUGH WASTE ANALYSIS INDICATES WASTE ASH TO BE EPITOXIC

(5) Were there any hazardous wastes stored on site at the time of the inspection? ✓

a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? ✓

b. If not properly packaged or in secure tanks, please explain.

WASTE ASH PILE REPORTEDLY PLACED ON A CONCRETE SLAB (ALTHOUGH NONE WAS VISIBLE). PILE HAD NO CONTAINMENT SYSTEM OR PROTECTION FROM ELEMENTS.

c. Are containers clearly marked and labelled? ✓

NO CONTAINERS

NA

d. Do any containers appear to be leaking? ✓

e. If "yes," approximately how many?

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year? ✓

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? *Not All Manifest Were Available, Nor Were All the TSD Certification Statements Available* ✓
 a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments.

Please See Additional Report

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Central Steel Drum Co. EPA I.D. Number: MSD011482577

COMPANY ADDRESS: 704 DOREMUS AVENUE, NEWARK, N.J. 07105

COMPANY CONTACT OR OFFICIAL: Mr. Paul Adamson OTHER ENVIRONMENTAL PERMITS HELD

TITLE: Plant Manager
(201) 344-8500

BY FACILITY: ☐ NPDES
☐ AIR
☐ OTHER } NONE

INSPECTOR'S NAME:

Angela Morales

DATE OF INSPECTION:

12/7/81

BRANCH/ORGANIZATION:

Surveillance & Monitoring

TIME OF DAY INSPECTION TOOK PLACE:

4:30 - 12:45

(1) Is there reason to believe that the facility has hazardous waste on site? Yes.

a. If yes, what leads you to believe it is hazardous waste?
Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☒ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report) See Appendix C in Report

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	—	<input checked="" type="checkbox"/>	—

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

Waste ash generated through drum refurbishing operation. Pile is 4-5 ft. high, and 15 feet in diameter

(2) Does the facility generate hazardous waste? ✓ — —

(3) Does the facility transport hazardous waste? — ✓ —

(4) Does the facility treat, store or dispose of hazardous waste? ✓ — —

VISUAL OBSERVATIONS(5) SITE SECURITY (\$265.14)

YES	NO	DON'T KNOW
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a. * Is there a 24-hour surveillance system?

—	✓	—
---	---	---

Fencing available but only partially surrounds area. b. Is there a suitable barrier which completely surrounds the active portion of the facility?

—	✓	—
---	---	---

c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?

—	✓	—
---	---	---

* Guard on site during week from 4pm-7am and during the weekend from Sat 12 noon - Mon. 7am

(6) Are there ignitable, reactive or incompatible wastes on site? (\$265.27)

—	✓	—
---	---	---

a. If "YES", what are the approximate quantities?

Solvent-based adhesive - residue in drums

b. If "YES", have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?

—	✓	—
---	---	---

c. If "YES", explain

d. In your opinion, are proper precautions taken so that these wastes do not:

- generate extreme heat or pressure, fire or explosion, or violent reaction?

—	✓	—
---	---	---

- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?

—	✓	—
---	---	---

- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?

—	✓	—
---	---	---

- damage the structural integrity of the device or facility containing the waste?

—	—	✓
---	---	---

- threaten human health or the environment?

—	✓	—
---	---	---

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

Yes, Please see attached report.

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (\$265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- a telephone or other device to summon emergency assistance from local authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- portable fire equipment?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
- adequate aisle space?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

- *(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed?

NO GROUND MONITORING PLAN.

If you have, please comment, as appropriate.

- (9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain.

Facility operation is very sloppy. Groundwater table is located 30 inches below.

- b. Do you believe that operation of this facility may affect groundwater quality?

"Possibly" - Adamson.

- c. If "YES", explain. Please see above (9a) explanation.

RECORDS INSPECTION

- (10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?

There is evidence that drums containing greater than 1 inch of waste were on site.

- a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?

- b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)

11 Manifest were available but these manifest were from Jan 1981 to present.

- * c. Does each manifest (or a representative sample) have the following information?

- a manifest document number

Company may not have a TSD facility permit.

NOTE - WASTE ARE MANIFESTED AS NON-HAZARDOUS BUT WASTE ANALYSIS PERFORMED BY DISPOSAL FACILITY INDICATES THE WASTE ASH TO BE EP TOXIC

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number	✓		
- the name, and EPA identification number of each transporter	✓		
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;	✓		
- a DOT description of the wastes		✓	
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	✓		
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	✓		
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.		✓	
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (\$265.13)		✓	
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary <u>✓</u> All wastes are basically the same <u> </u> Company treats all waste as hazardous <u> </u> Don't Know <u> </u>			✓
b. Does hazardous waste come to this facility from off-site sources?			✓
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest? N/A			
(12) <u>INSPECTIONS</u> (\$265.15)			
a. Does the facility have a written inspection schedule?		✓	
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?		✓	
c. Does the owner/operator record inspections in a log?		✓	
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.		✓	

(13) PERSONNEL TRAINING (\$265.16)

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? ☐ ☒ ☐
- type and amount of training to be given to personnel in jobs related to hazardous waste management? ☐ ☒ ☐
- actual training or experience received by personnel? ☐ ☒ ☐

(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? ☐ ☒ ☐

(\$265.51)

- a. Does the plan describe arrangements made with local authorities? ☐ ☒ ☐
- b. Has the contingency plan been submitted to local authorities? ☐ ☒ ☐

How do you know?

- c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? ☐ ☒ ☐
- d. Does the plan have a list of what emergency equipment is available? ☐ ☒ ☐
- e. Is there a provision for evacuating facility personnel? ☐ ☒ ☐
- f. Was an Emergency Coordinator present or on call at the time of the inspection? ☐ ☒ ☐

Emergency coordinator is the supervisor in the affected area

(15) Does the owner/operator keep a written operating record with: (\$265.73)

MAY NOT BE
APPLICABLE

- a description of wastes received with methods and dates of treatment, storage or disposal? ☐ ☒ ☐
- location and quantity of each waste? ☐ ☒ ☐

MAY NOT BE
APPLICABLE

- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? ☐ ☒ ☐
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? ☐ ☒ ☐

*(16) Does the facility have written closure and post-closure plans? (\$265.110)

a. Does the written closure plan include:

- a description of how and when the facility will be partially (if applicable) and ultimately closed? ☐ ☒ ☐

YES NO DON'T
KNOW

- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility? — ☒ —
- a description of the steps necessary to decontaminate facility equipment during closure? — ☒ —
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed? — ☒ —
- b. What is the anticipated date for final closure? — — ☒
- tc. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities? — ☒ —
- d. Does the written post-closure plan include:
 - a description of planned groundwater monitoring activities and their frequencies during post-closure? — ☒ —
 - a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure? — ☒ —
 - the name, address and phone number of a person or office to contact during post-closure? — ☒ —
- *(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it? — ☒ —
- *(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144) — ☒ —
- *(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90)
 - a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste management area? — — —
 - b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area? — — —

* This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

<u>STORAGE</u>	<u>TREATMENT</u>	<u>DISPOSAL</u>
<u>Waste Pile p. 9</u>	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
<u>Container p. 7</u>	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	<u>Thermal Treatment pp. 12-13</u>	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	YES NO DON'T KNOW
	Other _____	

CONTAINERS (\$265.170)

- Are there any leaking containers?
If "YES", explain.
Some incoming "empty drums" were seen with their contents on the ground.
- Are there any containers which appear in danger of leaking?
If "YES", explain. *YES*
- Do wastes appear compatible with container materials? *YES*
- Are all containers closed except those in use? *YES*
- Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak? *YES*
- How often does the plant manager claim to inspect container storage areas?
Daily
- Does it appear that incompatible wastes are being stored in close proximity to one another?
If "YES", explain. *YES*
- Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? *YES*
- What is the approximate number and size of containers with hazardous wastes?
Approx 25, 55 gallon drums containing waste sludge from the incinerator processes.

- | | <u>TANKS</u> (\$265.190) | <u>YES</u> | <u>NO</u> | <u>DON'T
KNOW</u> |
|---|--------------------------|------------|-----------|-----------------------|
| 1. Are there any leaking tanks?
If "YES", explain. | | — | — | — |
| 2. Are there any tanks which appear in danger of
leaking.
If "YES", explain. | | — | — | — |
| 3. Are wastes or treatment reagents being
placed in tanks which could cause them to
rupture, leak, corrode or otherwise fail?
If "YES", explain. | | — | — | — |
| 4. Do uncovered tanks have at least 2 feet
of freeboard or an adequate containment
structure? | | — | — | — |
| 5. Where hazardous waste is continuously
fed into a tank, is the tank equipped with
a means to stop this inflow? | | — | — | — |
| 6. Does it appear that incompatible wastes
are being stored in close proximity to one
another, or in the same tank?
If "YES", explain. | | — | — | — |
| 7. How often does the plant manager claim to
inspect container storage areas? | | | | |
| 8. Are ignitable or reactive wastes stored in
a manner which protects them from a source
of ignition or reaction?
If "YES", explain. | | — | — | — |
| 9. What is the approximate number and size of
tanks containing hazardous wastes? | | | | |

SURFACE IMPOUNDMENTS (\$265.220)

- | | | | |
|--|---|---|---|
| 1. Is there at least 2 feet of freeboard
in the impoundment? | — | — | — |
| 2. Do all earthen dikes have a protective
cover to preserve their structural integrity?
If "YES", specify type of covering. | — | — | — |
| 3. Is there reason to believe that incompatible
wastes are being placed in the same surface
impoundment?
If "YES", explain. | — | — | — |

YESNODON'T
KNOW

4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics?
If "YES", explain.

— — —

5. Are there any leaks, failures or is there any deterioration in the impoundments?
If "YES", explain.

— — —

6. Give the approximate size of surface impoundments (gallons or cubic feet).

WASTE PILES (\$265.250)

1. Is the waste pile protected from wind erosion?

— ☒ —

- a. Does it appear to need such protection?

— ☒ —

- b. Explain what type of protection exists.

A concrete slab was claimed to contain pile, none was visible.

2. Does it appear that incompatible wastes are being stored in the same waste pile?
If "YES", explain.

— ☒ —

3. Is leachate run-off from a pile a hazardous waste?

— ☒ —

- If "YES", explain this determination and answer (a) and (b) below.

- a. Is the pile placed on an impermeable base that is compatible with the waste?

— — ☒

- b. Is the pile protected from precipitation and run-on?

— ☒ —

4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite?
Please explain or indicate if no such wastes are present.

— — ☒

Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste?
Please explain.

— — ☒

5. How many waste piles are on site, and approximately how large are they?

One waste pile approx. 4-5 ft. high, 15 feet in diameter

LAND TREATMENT (\$265.270)

1. Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the

- | | | | |
|---|---|---|---|
| *2. Is run-on diverted away from the active portions of the land treatment facility? | — | — | — |
| *3. Is run-off collected? | — | — | — |
| 4. Are food chain crops being grown on the facility property? | — | — | — |
| a. If "YES", can the facility operator document that arsenic, lead and mercury: | | | |
| - will not be transferred to the crop or ingested by food chain animals or | — | — | — |
| - will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils. | — | — | — |
| b. Has notification of the growing of the food chain crops been made to the Regional Administrator? | — | — | — |
| 5. Is there a written and implemented plan for unsaturated zone monitoring? | — | — | — |
| 6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility? | — | — | — |
| 7. Do the closure and post-closure plans address: | | | |
| a. control of migration of hazardous wastes into the groundwater? | — | — | — |
| b. control of run-off, release of airborne particulate contaminants? | — | — | — |
| c. compliance with requirements for the growth of food-chain crops (if they are present)? | — | — | — |
| 8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain. | — | — | — |
| 9. Are incompatible wastes placed in the same land treatment area? If "YES", explain. | — | — | — |
| 10. What is the area of the land receiving hazardous waste treatment? | — | — | — |

LANDFILLS (\$265.300)

- | | | | |
|---|---|---|---|
| *1. Is run-on diverted away from the active portions of the landfill? | — | — | — |
| *2. Is run-off from active portions of the landfill collected? | — | — | — |

* Effective date for these requirements is May 19, 1981.

† These requirements are effective November 19, 1981.

- 3.. Is waste which is subject to wind dispersal controlled?
Explain. ___ ___ ___
4. Does the owner/operator maintain a map with:
- the exact location and dimensions of each cell ___ ___ ___
 - the contents of each cell and approximate location of each hazardous waste type ___ ___ ___
- 5.. Do the closure and post-closure plans address:
- control of pollutant migration via ground water? ___ ___ ___
 - control of surface water infiltration? ___ ___ ___
 - prevention of erosion? ___ ___ ___
6. Is ignitable or reactive waste treated before being placed in the landfill?
Explain how you know. ___ ___ ___
- 7.. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell?
If "NO", explain. ___ ___ ___
- 8.. Are bulk or non-containerized wastes containing free liquids placed in the landfill?
If "YES",
- a. Does the landfill have a liner which is chemically and physically resistant to the added liquid? ___ ___ ___
 - b. Is the waste treated and stabilized so that free liquids are no longer present? ___ ___ ___
- *9. Are containers holding liquid waste or waste containing free liquids placed in the landfill? ___ ___ ___
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills? ___ ___ ___
- If so, are they crushed flat, shredded or similarly reduced in volume before they are buried? ___ ___ ___
11. What is the approximate area of the hazardous waste landfill?

INCINERATORS AND THERMAL TREATMENT
(§§265.340 and 265.379)

YES NO DON'T
KNOW

Incinerator was
installed in
1950.

1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?

Natural Gas Unit on a conveyor belt. Connected to an after burner.

2. Was hazardous waste being incinerated or thermally treated during your inspection?
If "YES", answer all following questions.
If "NO", answer only questions 3 and 7.

— — ✓

3. Has waste analysis been performed (and written records kept) to include:

- heating value of the waste
- halogen content
- sulfur content
- concentration of lead
- concentration of mercury

— — ✓
— — ✓
— — ✓
✓ — —
✓ — —

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here ☐.

4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?

— ✓ —

5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:

- waste feed
- auxiliary fuel feed
- air flow
- incinerator temperature
- scrubber flow
- scrubber pH
- relevant level controls

— ✓ —
— ✓ —
— ✓ —
— ✓ —
— ✓ —
— ✓ —
— ✓ —

Every hour for:

- stack plume (color and opacity)

— ✓ —

5. Is there open burning of hazardous waste?

— — ✓

a. If "YES", what is being burned?
(only burning or detonation
of explosives is permitted)

b. If open burning or detonation of explosives is taking
place, approximately what is the distance from the open
burning or detonation to the property of others?

YES NO ~~DON'T~~
~~KNOW~~

6. Does the incinerator appear to be operating
properly? (Do emergency shutdown controls
and system alarms seem to be in good working
order?) Please explain.

*Plant Manager Paul Adamson,
stated there were problems with the temperature
of the incinerator.*

a. Is there any evidence of fugitive emissions?

7. Is the residue from the incinerator treated
by the owner as a hazardous waste?
Please explain.

*Waste is being manifested as
non hazardous.*

8. What types of air pollution control devices (if any)
are installed on the incinerator?

Don't Know

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (\$265.400)

1. Does the treatment process system show any
signs of ruptures, leaks, or corrosion?
Please explain.

2. Is there a means to stop the inflow of
continuously-fed hazardous wastes?

3. Is there ignitable or reactive waste fed
into the treatment system?

If "YES", has it been treated or protected
from any material or conditions which may
cause it to ignite or react? If so,
explain how.

Are the incompatible wastes placed in
the same treatment process?
If "YES", explain.

5. Describe the treatment system at this facility.

APPENDIX B: SITE LOCATION AND DESCRIPTION

CENTRAL STEEL DRUM CO.
704 DOREMUS AVENUE
NEWARK, NJ. 07105

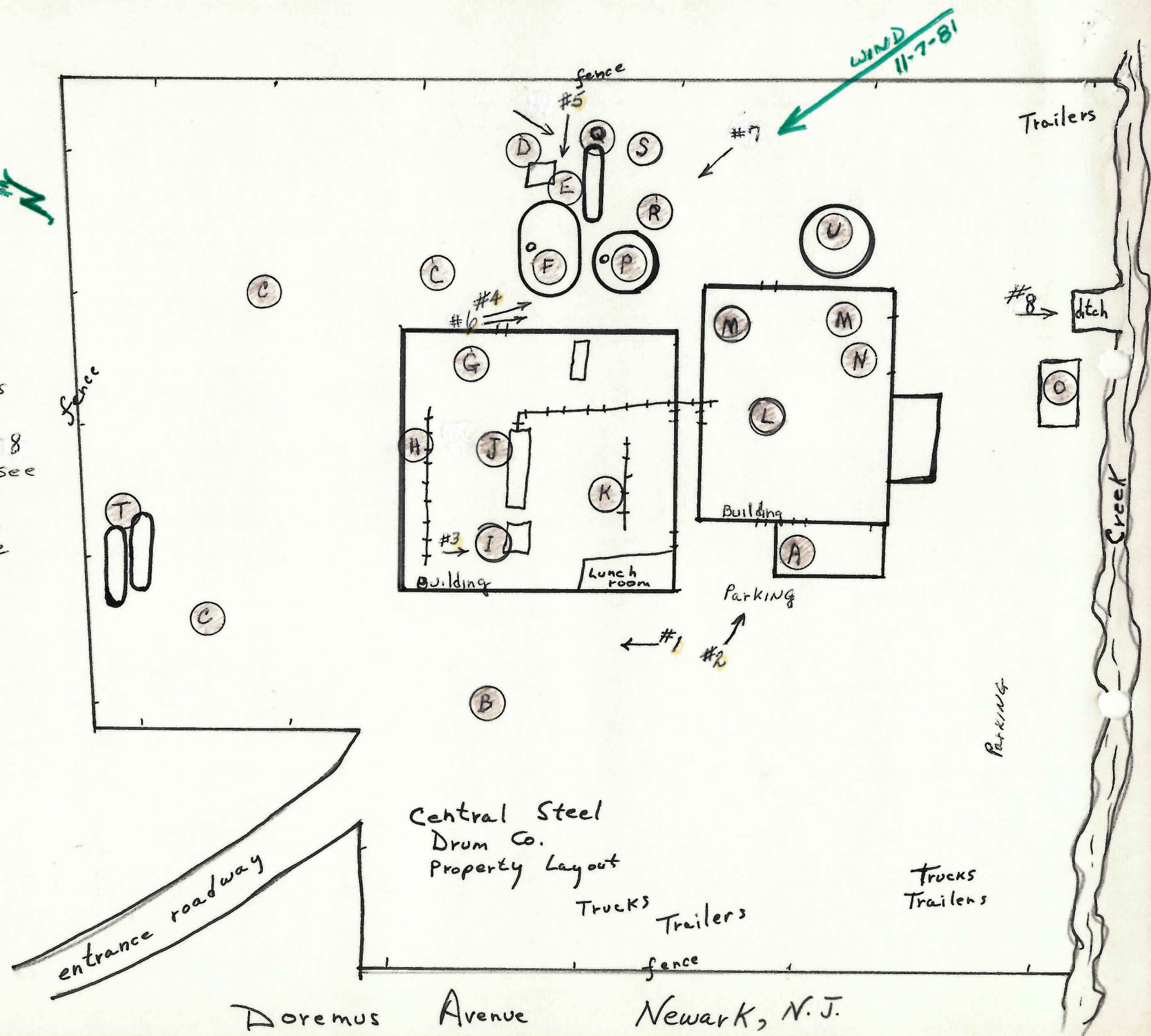
EPA ID# NJD011482577

ELIZABETH QUADRANGLE
NEW JERSEY-NEW YORK
7.5 MINUTE SERIES (TOPOGRAPHIC)

61651 SE
(WEEHAWKEN)



- Legend
- Circled letters see list
 - Numbers #1 to 8 with arrows see photographs
 - Not to scale



Central Steel Drum Lettered Areas

- (A) Office
- (B) Receiving and Storage of Drums
- (C) Storage incoming Drums
- (D) Covered area protection from rain
- (E) Head end of Drum Process Incinerator
- (F) Drum Process Incinerator
- (G) Cooperage area
- (H) Conveyor to headend of the inside of the drum painting line
- (I) Inside of drum finishing
- (J) Inside of drum drying
- (K) Lid process line
- (L) Outside of drum finishing line
- (M) Storage of finished drums
- (N) Shipping
- (O) Paint shed
- (P) Sludge Incinerator
- (Q) Process Water tank - about 2000 gallons capacity
- (R) Ash pile
- (S) Drum storage of sludge from process Incinerator to be burned in sludge Incinerator
- (T) Tanks - each about 10,000 gallons capacity
- (U) Dust collector



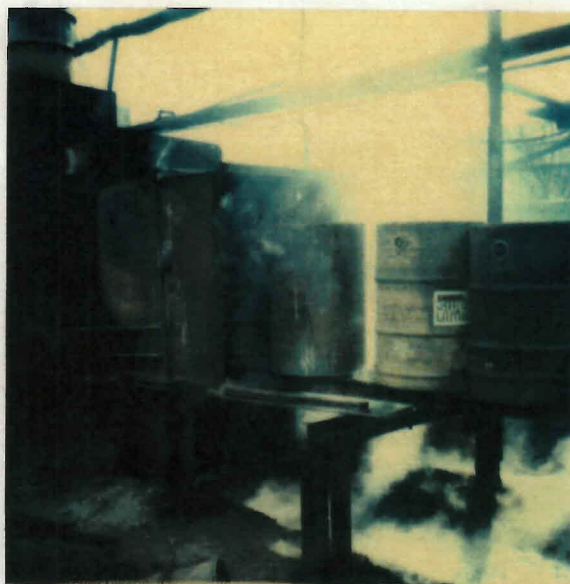
Central Steel Drum Newark, NJ
 #1 Unloading Area



#2 COVER STORAGE AREA



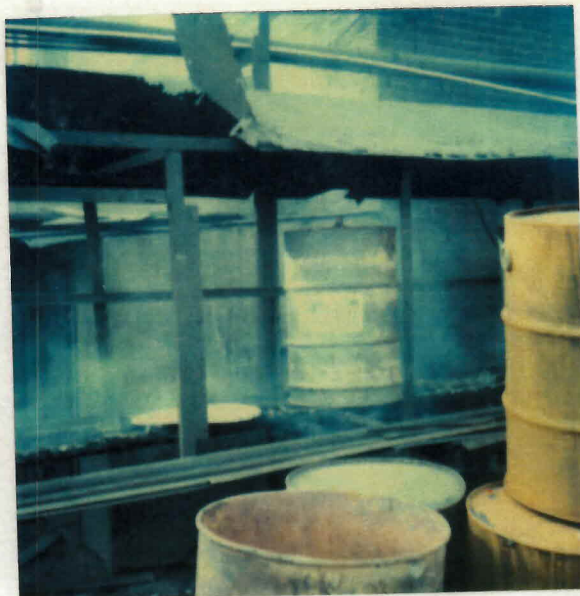
DRUM PAINTING AREA
 #3 HNU READING 25-30 ppm



DRUMS AS THEY ARE LEAVING
 #4 THE INCUBATOR
 HNU READING 10 ppm



#5 DRUMS WHICH HAVE ENTERED
THE INCINERATOR
HOU READING - OFF SCALE



DRUM INCINERATED IN PHOTO
#5 AS CONVEYOR BELT
#6 TAKES IT FOR FURTHER PROCESSING

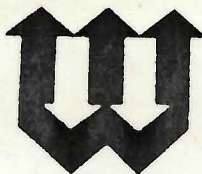


#7 Ash Pile with Sludge
Incinerator in background



NOTE
#8 BASE OF T-SHAPED CREEK
GREEN COLOR TO WATER

APPENDIX C: WASTE ANALYSIS



**GEOLOGICAL RECLAMATION
OPERATIONS AND WASTE
SYSTEMS, INC. (G.R.O.W.S.)**

~~Division of Waste Resources Corporation~~

Bordentown and New Ford Mill Road, Morrisville, PA 19067
Phone: (215) 295-8114

November 6, 1981

Mr. Gerald Greenburg
Central Steel Drum Co.
704 Doremus Avenue
Newark, New Jersey 07105

Re: D-148 "Incinerator Residue"

Dear Sir:

Enclosed are the results of an analysis of a sample, of the above referenced waste material, generated by your company. This sample was obtained directly from a shipment of the subject waste stream, prior to disposal at G.R.O.W.S.

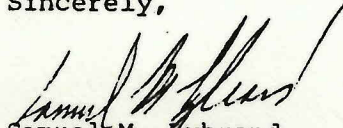
If the analytical results of certain parameters on the accompanying data sheet are circled, then they are considered to have been present in the sample of the waste, in concentrations excessive enough to warrant concern. Therefore, G.R.O.W.S., Inc. requests, in writing, a detailed explanation for the presence of these concentration levels or whether they are considered to be representative of the waste stream.

This explanation should be submitted to G.R.O.W.S. within thirty working days of the date on this letter. If we do not receive a response within the specified time period, disposal of this waste material, at G.R.O.W.S., may be terminated, with subsequent notice to the Pennsylvania Department of Environmental Resources.

If there are no parameters circled on the Retest Data Sheet, then the results were considered to be acceptable and no response from your company is required.

Please contact us if you have any questions.

Sincerely,


Samuel M. Lybrand

SML:ms

G.R.O.W.S., INC.

G.R.O.W.S. RETEST DATA SHEETGENERATOR CENTRAL STEEL DRUMWASTE STREAM DESCRIPTION INCINERATOR RESIDUEG.R.O.W.S. WASTE I.D. # D-148HAZARDOUS WASTE STATUS NON HAZARDOUS

<u>PARAMETER</u>	<u>TOTAL (mg/kg)</u>	<u>LEACHATE (mg/l)</u>
Chemical Oxygen Demand		<u>1889</u>
Total Organic Demand		<u>468</u>
Cyanide		
Percent Solids		
Phenols		
pH	<u>8.9</u>	<u>5.3</u>
Arsenic	<u>2.86</u>	<u>0.004</u>
* Barium	<u>610.0</u>	<u>0.59</u>
Cadmium	<u>48.3</u>	<u>0.46</u>
Chromium	<u>870</u>	<u>0.022</u>
* Copper	<u>6165</u>	<u>9.73</u>
Lead	<u>9000</u>	<u>27.9</u>
Mercury	<u>0.093</u>	<u><0.001</u>
Molybdenum	<u>922.0</u>	<u><0.01</u>
Nickel	<u>120.0</u>	<u>0.36</u>
Selenium	<u>0.093</u>	<u><0.001</u>
Silver	<u>0.083</u>	<u><0.009</u>

*For future reference please provide the maximum concentration of this parameter which can be expected in the subject waste material.

APPENDIX D: LIST OF COMPANIES AND CONTACTS

List of Companies and Contacts

INSPECTION TEAM

Angela Morales (Team Leader)
U.S. EPA Region 11
Source Monitoring Section
Edison, N.J. 08837
(201) 321-6623

John Witkowski
U.S. EPA Region 11
Emergency Response Section
Edison, N.J. 08837
(201) 321-6739

Hank Wheat/Mike Skirka
Ecology and Environment
300 McGraw Drive
Rariton Center 2nd floor
Edison, N.J. 08837
(201) 225-9659

GENERATOR

Paul Adamson, Plant Manager/Mr. Greenburg, Consultant/Alan Fisher, Secretary
Central Steel Drum Co.
704 Doremus Avenue
Newark, N.J. 07105
(201) 344-8500

TRANSPORTER

Jonas Waste Removal
Barkridge Road
Sewell, N.J. 08080
Phone Unknown

TREATMENT, STORAGE AND DISPOSAL FACILITY

Geological Reclamation Operations and Waste Systems Inc. (GROWS)
Bordentown and NewFord Mill Road
Morrisville, PA.
Samuel M. Lybrand
(215) 295-8114

LABORATORY CONTRACTOR TO GROWS INC.

Ages Laboratory
Potstown, PA.
George Buchanon, Director
(215) 326-9861

ENVIRONMENTAL CONTRACTOR TO CSD

Environmental Consulting Testing
496 North Kings Highway
Cherry Hill, N.J.
Gordon Yetta, Vice-President
(609) 779-1195

Facility Information

Central Steel Drum Co.
704 Doremus Avenue
Newark, N.J. 07105
NJD011482577

Company Contact

Lance Gold-Plant Manager
(607) 865-4141

Survey Participants

Angela Morales (201) 321-6623
Steve Hale
John Alonso

Date of Inspection

December 28, 1981

Purpose of Survey

A RCRA compliance inspection was performed on the Central Steel Drum Company located in Newark, N.J. by Angela Morales, Steve Hale and John Alonso of the Environmental Services Division of the U.S. E.P.A. Region II. The inspection involved a further record review (a follow-up of the December 7, 1981 inspection) and a sampling inspection.

Record Review

A review of the paper work for incoming "empty drum" shipments revealed that a manifest system is not used. Central Steel Drum Co. (CSD) uses a Bill of Lading System instead. Stamped on a Bill of Lading form sent by the KTK Corporation (a RCRA non-notifier, status 6) to CSD was this statement;

"Attention! Some Containers Hazardous When Emptied.
Since Emptied Containers Retain Product Residues
(Vapor or Liquid), All Labeled Hazard Precautions
Must be Observed."

Sampling

Samples were taken at the following locations:

1) Creek: Water	4 liters-NVOA
	2 vials-POA
	1 quart-Task 1&2(metal scan)
Sediment	1 quart jar-NVOA and POA
	1 quart jar-Task 1&2(metal scan)

JAN 27 11 34 AM '82
ENVIRONMENTAL AGENCY
NEW YORK, N.Y. 10007

2) Sludge in incinerator bin:

1 quart jar - NVOA, POA
1 quart jar - Task 1&2
1 quart jar - EP Toxicity

3) Sludge in overturned drum:

1 quart jar - NVOA, POA

✓ The results of the samples are pending and should be available in approximately one month.

After having obtained the samples, we gave Lance Gold, the plant manager, a receipt and split samples.

As we were getting ready to leave, the inspection crew noticed that employees unloading a trailer had called Mr. Gold over. Ms. Morales approached Mr. Gold and inquired as to what was causing the commotion. Mr. Gold then explained that his men were unloading a truck which contained "heavy drums" (drums with more an inch of waste). When asked where the shipment came from, Mr. Gold had no idea. When Mr. Gold was asked where the shipment would be sent, again he had no idea. Mr. Gold stated that CSD has customers who drop off shipments overnite and leave them at their facility.

The following day, Ms. Morales called CSD and asked to speak with Mr. Adamson (also a CSD plant manager). Mr. Adamson had been employed for a longer period of time (about 1 year as opposed to 3 months as in the case of Mr. Gold) by CSD and would probably have a better idea of incoming shipments. When asked where the shipment came from, he informed Ms. Morales that he was not aware of this particular shipment.

Comments

There seems to be an obvious lack of concern on the part of the Central Steel Drum Co. with respect to incoming shipments with more than an inch of waste. The Central Steel Drum Co. had stated in the past that they do not accept drum shipments containing more than an inch of waste. CSD has not made an effort to notify the sender of this shipment.

Additional inquiries will be made as to the origin of the shipment.